

BRAND & TAPPLY, LLC

ATTORNEYS AT LAW

ADAM J. BRAND ♦♦
TIMOTHY W. TAPPLY ◐●
COURTNEY J. LYONS ∞♦♦
SHAHAN J. KAPITANYAN
JOSEPH A. NETT ♦♦
SAMANTHA PUCKETT ◐◐
CONNOR T. FLYNN

555 WASHINGTON STREET, SUITE 6
WELLESLEY, MA 02482

t. 781.431.7878

f. 781.431.7844

5 PENN PLAZA, 23rd FLOOR
NEW YORK, NY 10001

ALSO ADMITTED IN CALIFORNIA ∞
ALSO ADMITTED IN NEW HAMPSHIRE ◐
ALSO ADMITTED IN NEW JERSEY ♦
ALSO ADMITTED IN NEW YORK ●
ALSO ADMITTED IN NORTH CAROLINA ■
ALSO ADMITTED IN RHODE ISLAND ◐
ALSO ADMITTED IN VERMONT ◐

Of Counsel

JANE TREEN BRAND ●
JEFFREY S. MARLIN ◐◐

PLEASE DIRECT ALL COMMUNICATIONS TO OUR
MASSACHUSETTS OFFICE

Via ECF

June 22, 2021

Honorable John P. Cronan
United States District Judge
United States District Court Southern District of New York
500 Pearl Street
New York, New York 10007

RE: National Union v. Accelerated
Docket No.: 1:20-cv-4042
Our File No.: ALLI.ACCELERATEDCOURIER

Dear Judge Cronan:

Pursuant to Local Rule 37.2, the defendant in this matter, Accelerated Courier, Inc. ("Defendant"), hereby requests an informal conference with the court for a pre-motion discovery conference. In compliance to the Civil Management Plan and Scheduling Order entered in this matter, Defendant submitted Initial Disclosures, Interrogatory Requests, and Requests for the Production of Documents to the Plaintiff on March 11, 2021.

However, despite multiple follow-ups from counsel for the Defendant, no Initial Disclosures or any responses to the Interrogatory Requests and Requests for the Production of Documents have been received. Further, due to the lack of discovery responses, the Defendant has been unable to seek the deposition of the Plaintiff at this time. Due to this, Defendant requests a discovery conference in order to resolve these issues and avoid the necessity of filing a related discovery motion.

We apologize to the Court for any inconvenience that this request may cause and thank the Court for its consideration of the foregoing request.

Respectfully,

/s/ Joseph A. Nett

Courtney J. Lyons
Joseph A. Nett

CC:

James A. Saville, Jr.
45 Broadway, Suite 1500
New York, New York 10006
(212) 669-0600
jsaville@hillrivkins.com

Defendant's request is granted. The Court will hold a conference on July 1, 2021 at 9:30 a.m. to discuss the discovery issues raised by Defendant. At the scheduled time, counsel for all parties should call (866) 434-5269, access code 9176261.

SO ORDERED.

Date: June 25, 2021
New York, New York



JOHN P. CRONAN
United States District Judge